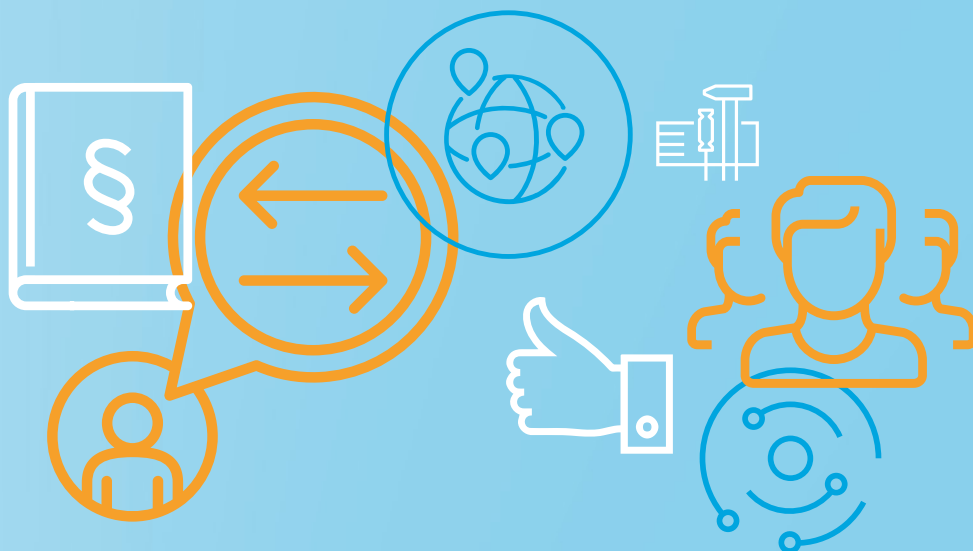


GLOBAL COMPLIANCE POLICY





AIMS

Polpharma Group's Global Compliance Policy (*hereinafter: GCP*) is a fundamental document in the area of compliance which provides the framework for the Compliance Management System (CMS), i.e. a system that ensures the compliance of operations with applicable legislation and voluntary commitments, and promotes an organisational culture based on values and ethical standards.

The aim of the GCP is to define the basic guidelines of the Compliance System for Polpharma Group entities (including Polpharma's foreign representative Offices), and those entities which are tied to the Polpharma Group organisationally or financially.

The GCP constitutes a universal set of rules of conduct that are compliant with legal regulations. However, in the unlikely situation in which the provisions of the GCP are inconsistent with the law of a given jurisdiction, local legislation shall apply first.

**We strive to make Polpharma Group's
compliance standards an inspiration
for all our strategic and business partners.**

COMPLIANCE MANAGEMENT SYSTEM

Polpharma Group's Compliance Management System is based on a risk assessment that sets out general and detailed tasks in terms of ensuring compliance with legal and ethical standards. It is the basis for introducing targeted institutional solutions. The Compliance Management System is evaluated and continuously improved in accordance with the PDCA (*Plan, Do, Check, Act*) cycle.

The development and maintenance of the Compliance Management System in the Polpharma Group is the responsibility of **Polpharma Group's Compliance Officer**, whose activities are supervised by **the Compliance Committee**, which comprises key Polpharma Group managers.

The principles contained in the GCP are detailed in internal documents adopted by individual Polpharma Group entities and those entities with organisational or financial links to Polpharma Group, and are adjusted to the legislation of the country in which the entity operates.

PRINCIPLES OF THE GLOBAL COMPLIANCE POLICY



1. WE ARE COMMITTED TO ETHICS



At Polpharma Group, we achieve our business objectives lawfully, in accordance with good practice and with a sense of social responsibility.

In all areas of our business, we strive to be guided by values, respect for others and established ethical standards.

Our standards are set by [the Polpharma Group Code of Ethics ↗](#). It defines the behavioural framework and provides the necessary support.

We require our business partners to respect the law and ethical principles. We promote the inclusion of ethical and anti-corruption clauses in contracts. As part of the Sustainable Supply Chain, we inspire, encourage and motivate the implementation of ethical infrastructure instruments ([Supply Chain Sustainability ↗](#)).

2. WE ARE GUIDED BY VALUES



At Polpharma Group, we are guided by values that result from our tradition and experience, a sense of responsibility and the specific nature of our activities, which serve to satisfy fundamental human needs related to health and quality of life.

Values are the basis of our organisational culture. We relate to them by supporting positive and ethical behaviour. We believe that compliance with the established internal rules of an organisation is a result of synergy between compliance principles/procedures and organisational values.

All entities affiliated with Polpharma Group should respect the Group's fundamental values by implementing them in their own organisational culture.

Affiliated entities can **take into account local circumstances** and define their own values considered necessary to build an organisational culture. These values should not conflict with Polpharma Group's values.

VALUE-BASED ORGANISATIONAL CULTURE

COMPLIANCE

all members of the organisation act in accordance with the rules

ETHICS

examines good and bad behaviour

INTEGRITY

compliance of values and acts



3. **WE RESPECT THE LAW**



Our actions are guided by the concept of the rule of law. We believe that the universal and consistent observance of the law is a guarantee of social order and the basis for long-term achievement of business objectives.

We follow the principle of the primacy of national law over internal company regulations. If there is a difference between national laws and company procedures, we are always guided by the more restrictive provisions.

4. WE COUNTERACT CORRUPTION




We see the risks associated with corruption and the negative effects that corruption incidents may have on the company's reputation. We fully respect the anti-corruption regulations imposed in the countries where we operate. We also support international anti-corruption standards and initiatives.

We counteract corruption in a systemic manner by implementing the Compliance Management System (CMS) and building an organisational culture based on values. The **Polpharma Group Anti-Corruption Code** and the **Compliance System Policy** are our formal points of reference. These documents are an expression of the principles we promote in relations with our business partners in Poland and in foreign markets.



AT POLPHARMA GROUP:

- *We do not tolerate corruption and activities that can be interpreted as corrupt. We do not suggest that we tolerate or practice corruption.*
 - *We do not offer or give gifts, benefits or gratuities in order to gain favour.*
 - *We do not pay government officials to facilitate or expedite the issuance of decisions or documents.*
 - *We do not accept undue financial or personal benefits.*
 - *We do not accept gifts that could damage the company's reputation and influence business decisions. Employees are required to report all received gifts.*
 - *In agreements with employees, associates, business partners and other entities, we recommend the use of anti-corruption clauses that are tailored to the person's position and legal relationship, and that are appropriate for the degree of corruption risk.*
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5. WE ARE TRANSPARENT



We define our relationships with stakeholders in an open way. We do not plan or take actions that would be illegal or perceived as violations of the law or good market practices.

All business transactions are properly documented, registered, described and recorded in the relevant accounting records. We keep our accounting records in a transparent manner, preventing funds from being used for corrupt activities. We document all Polpharma Group business operations, enabling us to present and prove the actual substance of a transaction in specific situations (e.g. inspections).

We pay special attention to relations with the public healthcare sector and government officials. We place emphasis on the reliable documentation of meetings and compliance with relevant internal regulations.

Our sponsorship activities and donations to people in need result from the principle of solidarity and a sense of social responsibility. We do not tolerate any connections between donations and public tenders, the number of prescriptions issued or sales results.

6. WE COMPETE FAIRLY



We act in accordance with all applicable antitrust rules and we do not tolerate the use of confidential information about competitors that may be offered by new employees or candidates.

We make sure that **our marketing activities comply with national law**. For this reason, we have implemented marketing instructions and procedures that stipulate rules of compliance with the law of the jurisdictions where we operate. Our representatives undergo regular training to help them apply these rules in an appropriate way.





7. WE AVOID CONFLICTS OF INTEREST

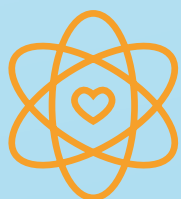


We are aware that in professional and business practice, situations of conflict of interest (understood as the possibility for an employee to put private interests before official duties) may arise. This concerns internal relations within the company, relations with external entities, as well as charity or sponsorship activities.

We understand the risks of a conflict of interest for the organisation and **try to avoid** situations in which this may arise. If a conflict of interest arises which could not be avoided or is unconnected with the employee, the employee must cease any activities that are affected by the conflict of interest and report the conflict to his or her immediate supervisor and the Compliance Officer.

Employees whose position and responsibilities particularly affect the scale of consequences resulting from potential conflicts of interest are **obliged to regular reporting**.

8. WE RESPECT THE RIGHTS AND LIBERTIES OF OTHERS



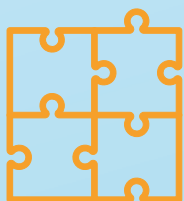
Respect for the dignity of others is one of Polpharma Group's fundamental values. We comply with international standards in the field of human rights, ensuring a safe working environment in legal, ethical and emotional terms. In particular, we counter all forms of discrimination and mobbing.

As we operate in an **international and multicultural environment**, we **value diversity**, which is the source of our organisation's social capital. We are open to everyone, regardless of gender, age, origin, nationality, religion, sexual orientation, appearance, health, physical condition or any other aspect. We believe in the potential of diversity and its importance for the development of the company, our innovativeness and the creation of a professional space that is friendly and free of irregularities.

Our **declarations are supported by appropriate internal procedures** based on legal and social conditions in a given jurisdiction.



9. WE CARE FOR THE COMMON GOOD



We are responsible for the protection and proper use of Polpharma Group's assets and do not accept their use for private purposes or in a manner inconsistent with applicable procedures.

We are committed to protecting personal data in accordance with the laws of the countries in which we operate.

We protect and secure confidential information provided to us by customers and business partners. At the same time, we do not use confidential information to which we do not have appropriate rights or permits.

We protect and secure against unauthorised access to or use of information concerning Polpharma Group companies of commercial, technical or scientific nature, the disclosure of which could expose Polpharma Group to damage.

Responsibility for compliance with the law, ethical standards and compliance rules applies to every employee, associate and entity related to Polpharma Group. This implies that action must be taken in the event of a suspected violation of the law or applicable ethical standards.

We enable our employees, associates, business partners and others to raise concerns about actual or potential irregularities.



In addition, employees are required to report any corrupt activity, not only existing, but also suggested or planned. Retaliation against whistleblowers is prohibited.

The infringement notification procedure provides a number of channels for informing and raising concerns. The rules for handling notifications are in line with the law and respect the obligations to the whistleblower.

10. WE DEVELOP AND IMPROVE



Polpharma Group's Compliance System is subjected to regular evaluation, which includes risk analysis and monitoring of changes in the organisation's legal environment. Conclusions and recommendations are implemented, thereby increasing the effectiveness of the system and the legal security of the organisation.

We undertake **continuous education in the area of ethical standards and compliance principles** applicable at Polpharma Group. It involves all employees and is conducted periodically in ways adapted to the organisational possibilities of a particular Group entity.

We maintain ethical standards in cooperation with our business partners through various forms of education, targeted directly at our contractors, jointly designing ethical and legal business standards.



